

REMARKS

Claims 2-22 and 24-44 are pending in the application.

Claims 2-22 and 24-44 have been rejected.

Claims 2 and 24-44 have been amended.

Unless otherwise specified in the below discussion, Applicants have amended the above-referenced claims in order to provide clarity or to correct informalities in the claims. Applicants further submit that, unless discussed below, these amendments are not intended to narrow the scope of the claims. By these amendments, Applicants do not concede that the cited art is prior to any invention now or previously claimed. Applicants further reserve the right to pursue the original versions of the claims in the future, for example, in a continuing application.

Specification

The Specification has been objected to as purportedly failing to provide proper antecedent basis for the claimed subject matter. The basis of this objection is the use of “computer program product” in the previous versions of Claims 24-44 and a purported lack of support in the specification for a computer program product. *See* Office Action, p.2.

Applicants have amended Claims 24-44 to claim a “computer-readable storage medium,” rather than the previous “computer program product.” Support for these amendments can be found at least at paragraph [0041] of the originally-filed Application. Applicants respectfully submit that in light of these amendments, the objections of the Office Action have been rendered moot.

Rejection of Claims under 35 U.S.C. §101

Claims 24-44 stand rejected under 35 U.S.C. §101 because the claimed invention is purportedly directed to non-statutory subject matter. Applicants respectfully traverse this rejection.

The basis of this rejection is the use of “computer program product” in the previous versions of Claims 24-44. As stated above, Applicants have amended Claims 24-44 to be directed toward a “computer-readable storage medium.” Applicants respectfully submit that such a “computer-readable storage medium” has been stated as statutory under 35 U.S.C. § 101. *See, e.g.*, MPEP 2106, 2106.01. Applicants further submit that support for these amendments can be found at least at paragraph [0041] of the originally-filed Application.

For at least these reasons, Applicants submit that Claims 24-44, as amended, are in condition for allowance. Applicants therefore respectfully request the Examiner’s reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

Rejection of Claims under 35 U.S.C. §112

Claims 2-22 and 24-44 stand rejected under 35 U.S.C. §112, second paragraph, as purportedly being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Applicants respectfully traverse this rejection.

The Office Action supports this rejection by stating that it is purportedly “unclear how defining a plurality of common objects and defining a schema for the common data type element are associated with the first and second data.” *See* Office Action, p.4. Applicants have amended independent Claims 2 and 24 to provide clarity as to the nature of the relationship between the

claimed “storing the first data and the second data in an intermediate format” and the “common data type elements” of the claimed schema.

Applicants submit that the above amendment addresses the concerns expressed by the Office Action. Applicants therefore respectfully request the Examiner’s reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

Rejection of Claims under 35 U.S.C. §102

Claims 2 and 24 stand rejected under 35 U.S.C. §102 as purportedly being anticipated by U.S. Patent No. 6,947,947 issued to Block et al. (“Block”). Applicants respectfully traverse this rejection.

Independent Claims 2 and 24, as amended, each contain limitations of substantially the following form:

managing enterprise data, wherein said managing enterprise data comprises
receiving first data in a first format from a first source system;
receiving second data in a second format from a second source system, wherein the
second format is distinct from the first format;
storing the first data and the second data in an intermediate format, wherein
the intermediate format is defined by a plurality of common objects,
the intermediate format comprises a schema defining a plurality of common data
type elements accessible by each of the plurality of common objects,
a data element defined by one of the common data type elements has a consistent
structure in each common object using that data element, and
said storing comprises mapping the first data and the second data to the
intermediate format using one or more of the common data type elements;
and
providing the stored first data and second data to a target system in a target format.

See, e.g., Claim 2 (amended). Applicants respectfully submit that the cited sections of Block fail to provide disclosure of all of these limitations.

As purported disclosure of the “receiving first data in a first format from a first source system” and “receiving second data in a second format from a second source system” limitations, the Office Action cites to the following section of Block:

In accordance with an embodiment of the invention, data output from a first computer platform or system can be automatically converted by a software module on the first platform, from a first format into an intermediate format, transferred to a second platform or system, and then converted from the intermediate format into a second format by a second software module on the second platform.

Block 4:23-28 (cited by Office Action, p.5). Applicants respectfully submit that this section of Block fails to provide disclosure of the limitations for which it is cited. The cited section of Block provides for data output from a first computer to be converted from a first format to an intermediate format on the first computer platform and then transferred to a second platform. Such a conversion and then transmission is clearly not the claimed action of receiving.

If the Office Action is referring to Block’s receiving of the intermediate format as being comparable to the claimed “receiving” of the first and second data in first and second formats, respectively, then Applicants submit that the cited section fails to provide disclosure of the amended limitation “wherein the second format is distinct from the first format.” Block provides a conversion to an intermediate format at the sending node so that “data can be transparently exchanged between the two platforms regardless of whether the first and second formats are compatible or known to each of the two platforms.” *See* Block 4:30-33. Block therefore explicitly avoids transmitting different formats. Thus, if two different nodes were sending data

to Block's "second platform" both nodes would be sending data in the same intermediate format and the second node would receive data in the same format from both nodes. This is not the case in the claims as presently amended.

Further, Applicants respectfully submit that the cited section of Block fails to provide disclosure of the claimed "storing the first data and the second data in an intermediate format." The Office Action cites to the following section of Block as purported disclosure of the "storing" limitation:

The transformation programs on the provider and receiver machines can be identical and both capable of receiving, transferring and mapping data, or can have different capabilities. For example, the transformation programs can be configured to handle an intermediate format so that the transformation program at the information provider would map the data to an intermediate format, and transfer the data in the intermediate format to the transformation program on the receiver machine.

Block 6:45-52 (cited at Office Action, p.5). Applicants submit that the cited section provides no disclosure of storing of any kind. Instead, the cited section merely relates to use of an intermediate format for transfer of data and then to be transformed on a receiving machine.

For at least these reasons, Applicants submit that the cited sections of Block fail to provide disclosure of all the limitations of independent Claims 2 and 24, as amended, and all claims depending therefrom and that these claims are in condition for allowance. Applicants therefore respectfully request the Examiner's reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

Rejection of Claims under 35 U.S.C. §103

Claims 3-22 and 25-44 stand rejected under 35 U.S.C. §103(a) as purportedly being unpatentable over Block and further in view of U.S. Patent No. 7,124,112 issued to Guyan et al. (“Guyan”). Applicants respectfully traverse these rejections.

In order for a claim to be rendered invalid under 35 U.S.C. §103, the subject matter of the claim as a whole would have to be obvious to a person of ordinary skill in the art at the time the invention was made. *See* 35 U.S.C. §103(a). This requires: (1) the reference(s) must teach or suggest all of the claim limitations; (2) there must be some teaching, suggestion or motivation to combine references either in the references themselves or in the knowledge of the art; and (3) there must be a reasonable expectation of success. *See* MPEP 2143; MPEP 2143.03; *In re Rouffter*, 149 F.3d 1350, 1355-56 (Fed. Cir. 1998).

Claims 4 and 26: As purported disclosure of the claimed “application instance name element” of these claims, the Office Action cites to the following section of text in Block:

The transformation programs on the provider and receiver machines can be identical and both capable of receiving, transferring and mapping data, or can have different capabilities. For example, the transformation programs can be configured to handle an intermediate format so that the transformation program at the information provider would map the data to an intermediate format, and transfer the data in the intermediate format to the transformation program on the receiver machine. The receiver machine would map the data from the intermediate format to another format useful on the receiver machine (or as desired by a user). The programs could be different versions, so that the transformation program recognizes more formats than the transformation program at the receiver machine and thus can map more formats to or from the intermediate format. In addition or as an alternative, the transformation program on the receiver machine can be configured or featured to only map the data out of

the intermediate format to another format, without being able to map data into the intermediate format in much the same way that Adobe Acrobat™ Readers can open and view, but not create, .pdf files. The transformation programs can also be configured to operate automatically without user intervention.

Block 6:45-66 (cited at Office Action, p.7). Applicants respectfully submit that the cited section of Block only relates to a transformation program at a transmitting machine and a transformation program at a receiving machine. The cited section provides that the transformation program at the receiving machine can be of a different version than that of the transmitting machine, and therefore be able to recognize more / different formats for translation from/to the intermediate format received from the transmitting machine. There is no disclosure in the cited section of an “application name instance element” in the intermediate format schema, as claimed. In fact, there is no disclosure of an application name at all. Nor does the Office Action suggest that Guyan provides this missing disclosure.

Claims 5, 7, 27 and 29: As purported disclosure of the claimed “error type element” of these claims, the Office Action cites to the following section of text in Guyan:

The most detailed area of claims processing is the handling of line items, which are itemized incidents of loss. Because of the manual nature of claims processing, the claims handler spends a great deal of time entering claim information into computer systems, tracking claims processing of line item details, evaluating line item details, and fulfilling line item data. Claims handlers are busy professionals who have to spend an inordinate amount of time on clerical details. This creates a tremendous potential for errors in the claims processing arena. These errors may result in overpayment or underpayment of claims that may harm the insurance company or damage the relationship between the insured, claimant and insurance company. Automating the claims processing field greatly reduces these errors and improve efficiency.

Guyan 1:51-65; *see* Office Action, p.7 (citing Guyan 1:59-61). This section of Guyan describes a scenario in which typical claim processing can generate “errors in the claims processing arena.” There is, however, no indication of the claimed “error type element” that is part of a fault handler input element. Instead, the cited section of Guyan merely expresses that there is a potential for error that is reduced when automating claims processing. Applicants therefore respectfully submit that the cited section of Guyan fails to provide disclosure of the claimed “error type element.” Applicants further note that the Office Action does not cite any section of Block as purportedly providing this disclosure.

For at least these reasons, Applicants submit that neither Block nor Guyan, alone or in combination, provides disclosure of all the claim limitations of at least dependent Claims 4, 5, 7, 26, 27 and 29, and all claims depending therefrom. Applicants therefore respectfully request the Examiner’s reconsideration and withdrawal of the rejections to these claims and an indication of the allowability of same.

CONCLUSION

In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5084.

If any extensions of time under 37 C.F.R. § 1.136(a) are required in order for this submission to be considered timely, Applicant hereby petitions for such extensions. Applicant also hereby authorizes that any fees due for such extensions or any other fee associated with this submission, as specified in 37 C.F.R. § 1.16 or § 1.17, be charged to deposit account 502306.

Respectfully submitted,

/Jonathan N. Geld/

Jonathan N. Geld
Attorney for Applicants
Reg. No. 44,702
Telephone: (512) 439-5090
Facsimile: (512) 439-5099